IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LEONARD C. JEFFERSON,

Plaintiff,

٧.

C.A. NO. 04-44 ERIE

WILLIAM WOLFE, ET AL., Defendants

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME

Plaintiff, Leonard C. Jefferson, pro se, pursuant to Rule 6 (b) of the Fed. R. Civil P., respectfully asks this Court to enlarge the time period wherein Plaintiff is allowed to file his Motion Opposing Defendants' Motion To Dismiss Third Amended Complaint (DOC # 67), and, in support of this motion Plaintiff asserts the following:

- 1. It appears that, instead of addressing the merits of the clearly articulated claims set forth in Plaintiff's Third Amended Complaint (DOC # 39) in a straightforward manner, defense counsel has employed a smoke screen strategy (via the gross distortions/misstatements, of Plaintiff's claims, in the Motion to Dismiss (DOC # 67)) in an attempt to cause the Court to become unable to see: (a) the claims set forth in Plaintiff's Third Amended Complaint do, in fact, state causes of action upon which relief can be granted, and (b) Defendants' Motion to Dismiss should be denied.
- 2. WHEREFORE: Plaintiff respectfully ask this Court to Grant Plaintiff's Motion for Enlargement of Time, to allow Plaintiff sufficient time to detect and correct all of defense counsel's subtle (but potentially dispositive) distortions/misstatements in his Motion to Dismiss, and to prepare a proper motion opposing Defendants' Motion to Dismiss (DOC # 67) which will effectively remove the smoke and secure and protect Plaintiff's right to obtain the relief

which he seeks in this action.

Respectfully submitted

Leonard C. Jefferson

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Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME has been sent via first-class mail on this 8th day of November, 2005 to the following:

CHRISTIAN D. BAREFORD Deputy Attorney General Office Of Attorney General 6th Floor, Manor Plaza 564 Forbes Avenue Pittsburgh, PA 15219

Leonard C. Jefferson, CL-4135

10745 Rt. 18

Albion, PA 16475-0002

Dated: 11/08/05

Leonard C. Jefferson, CL-4135 10745 Rt. 18 Albion, PA 16475-0002 November 8, 2005

Clerk's Office U.S. District Court P.O. Box 1820 Erie, PA 16507

RE: JEFFERSON V. WOLFE, ET AL., C.A. NO. 04-44 ERIE

Dear Sir or Madam:

Please file the enclosed Plaintiff's Motion For Enlargement Of Time in the above captioned case.

Thank you for your attention to this matter.

Respectfully
Neonard C. Jufferson